

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS**
(Sherman Division)

Vicki Baker,

Plaintiff,

v.

City of McKinney, Texas,

Defendant.

Case No.: 4:21-CV-0176-ALM

AFFIDAVIT OF JEFFREY REDFERN

Pursuant to 28 U.S.C. § 1746(2), I, Jeffrey Redfern, declare under penalty of perjury that the foregoing is true and correct:

1. I am a citizen of the United States, a resident of Washington, D.C., and over eighteen years of age. I am of sound mind and fully competent to make this affidavit, which I knowingly and voluntarily make based on my personal knowledge.

2. I am an attorney at the law firm, the Institute for Justice, and I am the lead attorney representing the plaintiff, Vicki Baker.

3. Attached as Exhibit A to my affidavit is a true and correct copy of Detective Michelle Read's Case Supplemental Report. I obtained this from Defendants' counsel, as part of their documents disclosed on May 24, 2021.

4. Attached as Exhibit B to my affidavit is a true and correct copy of Officer Eric Campbell's Reporting Officer Narrative. I obtained this from Defendants' counsel, as part of their documents disclosed on May 24, 2021.

5. Attached as Exhibit C to my affidavit is a true and correct copy of Officer Jesse Vasquez's Case Supplemental Report. I obtained this from Defendants' counsel, as part of their documents disclosed on May 24, 2021.

6. Attached as Exhibit D to my affidavit is a true and correct copy of Sergeant Christopher Kennedy's Case Supplemental Report. I obtained this from Defendants' counsel, as part of their documents disclosed on May 24, 2021.

7. Attached as Exhibit E to my affidavit is a true and correct copy of an audio recording made by Deanna Cook immediately after the conclusion of the police SWAT assault on Ms. Baker's house. I obtained this from Ms. Cook on March 4, 2021.

8. Attached as Exhibit F to my affidavit is a true and correct copy of Forensic Investigator Ashley Wilson-Byers's Case Supplemental Report. I obtained this from Defendants' counsel, as part of their documents disclosed on May 24, 2021.

9. Attached as Exhibit G to my affidavit is a true and correct copy of photographs of Ms. Baker's house, taken after the police SWAT assault. I obtained these from Defendants' counsel, as part of their documents disclosed on May 24, 2021.

Executed this 20th day of September, 2021.

/s/ Jeffrey Redfern
Jeffrey Redfern